

**U.S. Department of Justice**

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May 15, 2025

Via Electronic Filing

Honorable Karen M. Williams, U.S.D.J.
United States District Court
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re: *Reading v. Duff*, No. 23-cv-1469 (KMW)(SAK)
Request to File Overlength Brief**

Dear Judge Williams:

This office represents the Individual Federal Defendants¹ and Federal Official Capacity Defendants² (together, the “Federal Defendants”) in the above-referenced mandamus case arising from the alleged violation of Plaintiff Angela Reading’s First Amendment rights. With Plaintiff’s consent, we respectfully request leave to file an overlength brief of 40-pages in 12-point proportional font in support of our forthcoming motion to dismiss, which is due on May 28, 2025.

The Federal Defendants respectfully submit that they require additional pages to fully respond to the wide-ranging issues raised by Plaintiff’s Second Amended Complaint, which includes 91-pages, 310 paragraphs, and 44 exhibits incorporated by reference. This office represents 4 federal officers sued in their individual capacity and 9 federal officers sued in their official capacity. Plaintiff brings multiple claims against these defendants that each raise complex legal and factual questions. We

¹ The Individual Federal Defendants represented by this office are Colonel Robert Grimmett, Lieutenant Colonel Megan Hall, Major Nathaniel Leshner, and Joseph Vazquez in their individual capacities. Plaintiff also sued a fifth federal employee in his individual capacity, Major Christopher Schilling, who is represented by private counsel.

² The Federal Official Capacity Defendants are Colonel Wes Adams, Colonel Robert Grimmett, Lieutenant Colonel Megan Hall, Major Nathaniel Leshner, Major Christopher Schilling, Joseph Vazquez, Colonel Mitchell Wisniewski, Kristi Noem, and Adam Stahl in their official capacities.

therefore respectfully request 10 additional pages to adequately present all the defenses relevant to this action.

We would of course consent to a similar extension of the page limit for Plaintiff's opposition brief or an extension of Plaintiff's time to respond should she request it. Thank you very much for your consideration.

Respectfully submitted,

So Ordered on 5/21/2025.

ALINA HABBA
United States Attorney

Karen M. Williams

KAREN M. WILLIAMS, U.S.D.J.

By: s/ Andrew Boccio
ANDREW BOCCIO
Assistant United States Attorney
Attorneys for Federal Defendants

cc: All counsel of record (via ECF)